

EXHIBIT 3
Proposed Order

1 PIERCE A. MACCONAGHY (SBN 341371)
pierce.macconagh@stblaw.com
2 SIMPSON THACHER & BARTLETT LLP
2475 Hanover Street
Palo Alto, CA 94304
3 Telephone: (650) 251-5000
Facsimile: (650) 251-5002
4

5 ANDREW T. FRANKEL (*pro hac vice*)
afrankel@stblaw.com
6 MICHAEL H. TORKIN (*pro hac vice*)
michael.torkin@stblaw.com
7 DAVID ELBAUM (*pro hac vice*)
david.elbaum@stblaw.com
8 SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue
New York, NY 10017
9 Telephone: (212) 455-2000
Facsimile: (212) 455-2502
10

11 *Counsel for Century Indemnity Company, as*
12 *successor to CCI Insurance Company, as*
successor to Insurance Company of North
13 *America, Pacific Indemnity Company, and*
Westchester Fire Insurance Company as
14 *successor in interest to Industrial*
Underwriters Insurance Company for
policies JU835-8355 and JU895-0964

15 *(Additional counsel listed on signature page*
of the Application)
16

17 Mark D. Plevin (State Bar No. 146278)
CROWELL & MORING LLP
18 Three Embarcadero Center, 26th Floor
San Francisco, California 94111
19 Telephone: (415) 986-2800
Email: mplevin@crowell.com
20

21 Miranda H. Turner (*pro hac vice*)
Jordan A. Hess (*pro hac vice*)
CROWELL & MORING LLP
22 1001 Pennsylvania Avenue, N.W.
Washington D.C. 20004
23 Telephone: (202) 624-2500
Email: mturner@crowell.com
j'hess@crowell.com
24

25 *Attorneys for*
CONTINENTAL INSURANCE COMPANY
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

9 In re:
10 The Roman Catholic Archbishop of San
11 Francisco,
12 Debtor and
13 Debtor in Possession.

Case No. 23-30564 (DM)

Chapter 11

[PROPOSED] ORDER APPROVING *EX PARTE APPLICATION OF CERTAIN INSURERS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 COMPELLING PRODUCTION OF DOCUMENTS*

9 Upon consideration of the *Ex Parte Application of Certain Insurers for Entry of an Order*
10 *Pursuant to Bankruptcy Rule 2004 Compelling Production of Documents* [Docket No.] (the
11 “Application”),¹ the record in this case, and for good and sufficient cause appearing,

12 IT IS HEREBY ORDERED AS FOLLOWS:

13 1. The Application is GRANTED.

14 2. The Insurers are authorized to issue a subpoena directed to the Debtor (the “**Debtor Subpoena**”) requiring the Debtor to produce documents responsive to the Debtor Document Requests.

15 3. Except as otherwise agreed by the Insurers, the Debtor shall furnish all documents the Insurers request in the Debtor Subpoena and shall produce the same to the Insurers’ counsel within fourteen (14) days of service of the Debtor Subpoena upon entry of this Order.

16 4. The Insurers are authorized to issue a subpoena directed to the Committee (the “**Committee Subpoena**”) requiring the Committee to produce documents responsive to the Committee Document Requests.

17 5. Except as otherwise agreed by the Insurers, the Committee shall furnish all documents the Insurers request in the Committee Subpoena and shall produce the same to the Insurers’ counsel within fourteen (14) days of service of the Committee Subpoena upon entry of this Order.

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28 ¹ All terms not otherwise defined in this Order shall have the meanings ascribed to them in the Application.

1 6. Nothing herein shall prejudice the Insurers' rights under Rule 2004 and other
2 applicable laws to seek further document production and/or oral examinations in connection with
3 the above-captioned case.

4 7. The Court shall retain jurisdiction to hear and determine all matters arising from or
5 related to the implementation of this Order.

6 ****END OF ORDER****